TECHNICAL REVIEW DOCUMENT for OPERATING PERMIT 950PLR073

to be issued to:

Colorado State University (CSU)

Larimer County

Source ID 0690011

Prepared on August 12, 1997 Revised on November 19 & 24, 1997 and February 5, 1998 Peter K. Nelson, Review Engineer

> Revised on May 20, 1998 Vincent L. Brindley, Review Engineer

I. Purpose:

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA and during Public Comment. The conclusions made in this report are based on information provided in the original application submittal of November 20, 1995, additional submittals of April 10 and 22, 1996, meetings and telephone conversations with the source. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

On April 16, 1998 the Colorado Air Quality Control Commission directed the Division to implement new procedures regarding the use of short term emission and production/throughput limits on Construction permits. These procedures are being directly implemented in all operating permits that had not started their Public Comment period as of April 16, 1998. All short term emission and production/throughput limits that appeared in the construction permits associated with this facility that are not required by a specific State or Federal standard or by the above referenced Division procedures have been deleted and all annual emission and production/throughput limits converted to a rolling 12 month total. Note that, if applicable, appropriate modeling to demonstrate compliance with the National Ambient Air Quality Standards was conducted as part of the Construction Permit processing procedures. If required by this permit, portable monitoring results and/or EPA reference test method results will be multiplied by 8760 hours for comparison to annual emission limits unless there is a specific condition in the permit restricting hours of operation.

Any revisions made to the underlying construction permits associated with this

facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. Source Description:

This source is a major university classified under Standard Industrial Classification (SIC) 8221. As a university, many varied activities take place on several campuses. However, only the heating plant (SIC 4961) on the main campus and incinerator units at the Center for Disease Control (CDC) and Animal Disease Laboratory (ADL), best classified under SIC 8071, warrant permitting. Colorado State University (CSU) has three campuses and a research park in the city of Fort Collins, Larimer County, Colorado. The heating plant is on the main campus, located at Lake Street and College Avenue. The CDC and ADL are located at the Foothills Campus just off of Rampart Road. The city of Fort Collins is in an area designated as non-attainment for Carbon Monoxide. Wyoming is designated as an affected state within 50 miles of the facility. Two Federal Class I wilderness areas, Rocky Mountain National Park and Rawah Wilderness Area, are located within 100 kilometers of CSU. This facility is considered to be a synthetic minor for purposes of the Prevention of Significant Deterioration (PSD) program and a minor source for nonattainment New Source Review. Potential to Emit (PTE) estimates include 82 insignificant/exempt boilers and 19 insignificant/exempt emergency generators which are otherwise not in the operating permit or emissions inventory system. Emissions for the facility are as follows:

Pollutant	Potential to Emit (tpy)	Actuals (tpy)
PM	5.4	1.3
PM_{10}	5.2	1.2
SO_2	42.3	0.70
NO_x	222.6	143.7
CO	17.1	11.5
VOC	2.5	1.2

The potential to emit for the 82 insignificant/exempt boilers was based upon 8760 hours per year and an average of 3 mmBtu/hr fuel input rate. PTE for the 19 insignificant/exempt generators was based on a maximum of 250 hours/yr operation. Actual emissions are based upon APENs submitted in 1995 as well

as information provided in the application and by the source. This facility is required to provide updated APENs in the event that emissions undergo a significant change as defined by Regulation No. 3, Part A, Section II, C.2. Under the guidelines of EPA's Whitepaper for streamlining the operating permit process, actual emissions for the last data year were not required during the application process. Therefore, the Division assumes that emissions from this facility have remained the same or decreased since the last APEN submittal based upon the compliance certification in the operating permit application.

III. Emission Sources:

The following sources are specifically regulated under terms and conditions for the Operating Permit for this Site.

A. Units:S001: Babcock & Wilcox, Model FM 2990, S/N: BW-24790, 181 mmBtu/hr Boiler #1 - Natural Gas or Fuel Oil Use

S002: Babcock & Wilcox, Model PFI-3063, S/N: BW-22213, 181

mmBtu/hr

Boiler #2 - Natural Gas or Fuel Oil Use

S003: Union Iron Works, Model 90460, S/N: UIW-7042, 88 mmBtu/hr

Boiler #3 - Natural Gas or Fuel Oil Use

1. Applicable Requirements - Unit S001 is covered under construction permit 85LR251. The initial approval for this permit was issued December 18, 1985 with the final approval dated May 15, 1987. Units S002 and S003 were constructed in 1960 and have not been modified since. They are therefore "grandfathered" under Regulation No. 3, Part B, Section I.A. from the requirement to obtain a construction permit.

Originally, the facility had 4 boilers. In 1985 two of the boilers were removed and unit S001 was installed. At the time, a PSD review incorrectly determined that a significant increase would not take place. A recent analysis shows that the net increase due to the new boiler was 70.05 TPY of NOx - above the 40 TPY significance level. This means that a PSD review should have taken place since the source would have been classified as a major stationary source based upon PTE. However, in all likelihood CSU would have chosen to permit the grandfathered boilers such that the PTE from the facility did not trigger PSD. While the PTE from the grandfathered boilers may be high, actual emissions from the facility have never exceeded 150 TPY NOx. Therefore, CSU has agreed to accept federally enforceable limitations on units S002 and S003 such that the source is a synthetic minor for PSD purposes. Because the Operating Permit is expected to be issued soon, initial and final approval construction permits will not be issued. The conditions will be added to the operating permit

under Colorado Regulation No. 3, Part B, Section III.A.4. (03/21/96).

The generally applicable 20% opacity provisions apply as do yearly limitations for the criteria pollutants NOx, CO, VOC, SO₂, PM, and PM₁₀. Fuel consumption of natural gas and fuel oil is limited on a yearly basis. The boilers are also subject to the particulate standard for fuel burning equipment as stated in Colorado Regulation No. 1, Section III.A.1.b. The regulation requires that units meet a lbs/MMBTU particulate matter (PM) emission limit (PE) based on the following equation:

PE=0.5(FI)^{-0.26} where FI = Fuel Input in Million Btu per Hour.

Unit S001, because it was constructed after 1977 is also subject to the State-Only New Source Performance Standard (NSPS) for particulate matter and for sulfur dioxide in Colorado Regulation No. 6. Title V allows the implementing authority to remove conditions which are superseded by more stringent applicable requirements. In the cases of particulate matter and sulfur dioxide, the Regulation No. 6 standards are the same as the state and federally enforceable Regulation No. 1 standards which will be cited in the permit.

Unit S001 is gas-fired with fuel oil backup. The use of fuel oil is limited to approximately 17 hours per year. Since the boiler was constructed between June 19, 1984 and June 19, 1986, the applicability determination is covered under 40 CFR 60 60.40b (b). These determinations are for coal or oil fired facilities, with no mention of boilers firing natural gas or of the use of back-up fuels. The Division believes that because this source uses primarily natural gas and only uses oil for emergency back-up or for testing purposes, that it does not meet the applicability criteria and therefore Subpart Db does not apply.

The yearly emission limitations for S001 were modified from the final approval construction permit. The original permit did not take into account emissions resulting from the burning of fuel oil. The boilers are also subject to the 30% opacity standard as stated in Colorado Regulation No. 1, Section II, A.4., for opacity resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment.

The short term limits on emissions and fuel consumption have been removed from the applicable requirements per the guidance in paragraph two (2) of this document. Short term limits for Particulate Matter and Sulfur Dioxide remain as they are standards from Regulation No. 1.

2. Emissions Factors - The emissions from the boiler are generated from the

combustion of natural gas, fuel oil (#6), or a combination of both. The pollutants of concern when burning natural gas are NOx and CO. Fuel oil combustion typically results in higher emissions of SO₂ and particulate matter (PM and PM₁₀). The source did not identify the emission factors to be used to verify compliance with emission limits. In general, AP-42 emission factors are accepted as representative for these types of boilers and are typically of good quality. EPA Document 454/R-95-012, FIRE Version 5.0, Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants (August 1995), essentially places AP-42 data into easily used tables. The emission factors used are:

EPA-454/R-95-012 FIRE Version 5.0 (August 1995)					
	Emission Factors				
	SCC: 10200401	SCC: 10200601	SCC: 10200602		
	Boilers 1-3	Boilers 1&2	Boiler 3		
Pollutant	Fuel Oil lbs/1000 gal.	Natural Gas lbs/mmScf	Natural Gas lbs/mmScf		
NOx	55.0	550.0	140.0		
SO ₂	158.6 (S)	0.6	0.6		
VOC	1.13	1.4	2.8		
СО	5.0	40	35.0		
PM ₁₀	0.86*[9.19 (S) + 3.22]	3.0	3.0		
РМ	9.19 (S) + 3.22	3.0	3.0		

(S) is the weight percent of sulfur present in the fuel oil

3. Monitoring Plan - In addition to monitoring monthly fuel use and maintaining records of fuel oil weight percent sulfur and heating value, the source will be required to calculate monthly emissions. The source will not be required to continually test the fuel oil for sulfur content and heating value. Instead, the supplier's guaranteed analysis may be used to provide the necessary information. Records of the supplier's guarantee shall be maintained at the facility. Testing of the fuel oil will only be required if the sulfur content of the newly supplied oil, by itself, would cause a violation of the standards. In

these cases, a sample of the mixture in the main storage tank would be tested to ensure that the combined sulfur content of the old and new supply is below the standard. Natural gas fuel sampling is not required.

Demonstration of compliance with the standards for particulate matter and sulfur dioxide is only necessary when burning fuel oil. By calculation, the combustion of natural gas results in emissions several orders of magnitude lower than the standards. When burning fuel oil the particulate and sulfur limits will be demonstrated by inserting the fuel oil sulfur and heat content values into the appropriate equation (where (S) is the weight percent of sulfur present in the fuel oil), below:

Compliance with the 20% opacity standard will be ensured by the burning of pipeline quality natural gas. When burning fuel oil the source will be required to perform a visual observation of the plume, using EPA Method 9, within 24 hours of completing the startup and every month thereafter during normal operation.

Compliance with the 30% opacity standard will be assured by the burning of pipeline quality natural gas. When burning fuel oil the source will be required to perform a visual observation of the plume, using EPA Method 9, once per year and every 24 hours during the startup activity.

4. Compliance Status - The source certified in the Title V permit application that the boilers were in compliance with all applicable requirements. The facility was inspected on January 25, 1996 and was found to be in compliance. Previous to this, in 1994 and 1995, the facility burned fuel oil in the number 1 boiler without notifying the Division and during a period which was not a curtailment. No enforcement action arose from this incident and the notification and curtailment conditions were dropped as requirements (no basis could be found for these requirements) during the drafting of the operating permit. The facility is currently considered to be in compliance with all applicable requirements.

B. Unit S004: Shenandoah, Model P25-2GN-M1, S/N: 868088, Biomedical

Waste Incinerator

1. Applicable Requirements - This unit was issued an initial approval construction permit (91LR693) on August 7, 1992. The permit was moved to final approval status on November 19, 1997 based upon the source's self-certification of compliance on December 10, 1996. Because an operating permit has been drafted, and is expected to be issued shortly, no final approval construction permit was written and the applicable requirements were transferred directly to the operating permit. The pertinent applicable requirements from this permit are as follows:

This source must comply with the state-only NSPS for Biomedical Incinerators, Regulation 6, Part B, Section V. This NSPS is more stringent than the general incinerator conditions of Section VII. Biomedical waste includes anatomical/pathological wastes, infectious wastes, chemotherapeutic wastes and other wastes generated in health care facilities and medical laboratories that require special handling (definition from Regulation No. 6, Part B, Section V, B.1.). Biomedical waste incinerators may burn non-organic material such as that generated in operating rooms. Specific requirements include:

- I) opacity is not to exceed 10%
- ii) particulate emissions are not to exceed 0.08 grains/dry standard cubic foot, including condensibles, corrected to 7% O₂.
- iii) hydrogen chloride (HCL) emissions are not to exceed four (4) pounds per hour or a 90% reduction by weight in emissions, on an hourly basis shall be achieved.
- iv) carbon monoxide emissions are not to exceed 100 parts per million, dry volume (ppmvd), corrected to $7\% O_2$.
- v) an interlock mechanism must be in place to prevent charging (loading) the incinerator until the secondary combustion chamber exit temperature is established and holding at 1800°F. During startup the secondary combustion chamber must be pre-heated to at least 1800°F prior to firing the main burner. During shut-down, the secondary combustion temperature must be maintained at 1800°F until the final waste is burned. The secondary chamber shall have a residence time of 1 second.
- vi) continuous temperature monitoring and recording devices must be installed and operated.
- v) radioactive material may not be burned in this incinerator and a Geiger counter must be used to check for radioactive waste (as per Radiation Control Division and Hazardous Materials and Waste Management Division).

The construction permit also requires that detailed summaries of the waste

burned, charging rates, and number of batches be maintained. Permit 91LR693 required that this information be maintained for two years, however, the more stringent five year recordkeeping requirements of the operating permit program take precedence. Permit 91LR693 also stated that the source must meet the odor requirements of Colorado Regulation No. 2. This condition may be found under the "general conditions" of Section IV of the operating permit. Criteria emissions of NOx, CO, VOC, SO2, PM, and PM10 are less than 100 lbs/year for each pollutant - far below deminimis levels. Calculation of criteria emissions will not be required.

Recently a NSPS (40 CFR 60 - Subpart Ce) was promulgated by EPA for Hospital/Medical/Infectious Waste Incinerators. This incinerator appears to be subject to this new NSPS. However, the guidelines for existing incinerators requires a state plan detailing the emission limits and monitoring/compliance requirements. Currently, the Division is on pace to adopt the NSPS and have this plan approved or disapproved by EPA no later than March 1999. Meanwhile, the NSPS is not federally or state enforceable and the conditions relating to the NSPS are not included in this permit. The source will have approximately one (1) year after the NSPS is approved by the State and EPA to incorporate the conditions into the Title V permit. Title V requires that operating permits with more than 3 years left before expiration be re-opened to include requirements which are newly applicable.

There were no short term limits removed from this point. All short term limits and other standards are specifically required by regulation and as such will remain as per paragraph two (2) of this document.

- **2. Emission Factors -** Permit 91LR693 does not provide criteria emission limitations on the source with the exception of particulates and carbon monoxide. As stated above, the calculation of criteria emissions will not be required for this unit.
- **3. Monitoring Plan -** The source will maintain detailed records for each burn including: date and time, type of waste and generation location, weight of charge, initials of operator and any notes regarding incinerator operation. The unit will only be operated by personnel who are competent and knowledgeable of the incinerator's operating and maintenance procedures.

Emissions from this unit are extremely low and the source will not be required to calculate them. However, compliance with the particulate, CO, and HCL limitations must still be determined. Short of installing monitors which continuously measure emissions, it is difficult to quantify emissions at the ppmvd level. However, the temperature, maintenance, and operational requirements

imposed on the source should ensure that compliance is met. Additionally, timers shall be used to ensure that proper burn rates are maintained. A compliance test will be required within 180 days of permit issuance and thereafter no less frequently than once every five years to provide actual emissions data and the residence time. The Division also reserves the right under Colorado Regulation No. 1, Section III, B.3. to request a stack test due to a permit amendment, control equipment modification, or under reasonable belief that emission standards are being violated. An observation of visible emissions will be performed on an annual basis using EPA's Method 9.

This source appears to meet the definition of a small Hospital/Medical/Infectious Waste Incinerator (HMIWI). As a small HMIWI this source will need to meet the following limitations:

PollutantEmission LimitParticulate Matter0.05 gr/dscfCarbon Monoxide40 ppmv

Dioxins/Furans 55 gr/billion dry standard cubic feet

Hydrogen Chloride 100 ppmv Sulfur Dioxide 55 ppmv Nitrogen Oxides 250 ppmv

Lead 0.052 gr/thousand dry standard cubic feet Cadmium 0.07 gr/thousand dry standard cubic feet Mercury 0.24 gr/thousand dry standard cubic feet

An initial compliance test for the above pollutants is also required. Facilities must then test for PM, CO, HCL, and opacity on an annual basis. Because of the difficulty in meeting the limitations as well as the overall costs involved, the Division believes many affected facilities will be dismantled or converted to uses not covered by NSPS Ce.

- **4. Compliance Status -** The source certified that they were in compliance with all applicable requirements. The Compliance Monitoring and Enforcement (CM&E) unit determined that a test of the CSU incinerator was not required since the same model incinerator had already passed compliance tests at another facility. File information, however, indicates that the tested unit had difficulties meeting the one (1) second residence time requirement. While this was eventually resolved, the above required stack test should ensure that this incinerator meets the emissions and residence time requirements. This source is currently in compliance with all applicable requirements.
- C. Unit 005: Therm-Tec, Model A-4-P, S/N: 4466, Pathological Waste Incinerator

1. Applicable Requirements - This unit was issued initial approval construction permit 93LR1279I on February 1, 1994. The permit was moved to final approval status on November 19, 1997 based upon the source's self-certification of compliance on December 10, 1996. Because an operating permit has been drafted, and is expected to be issued shortly, no final approval construction permit was written and the applicable requirements were transferred directly to the operating permit. The pertinent applicable requirements from this permit are as follows:

During review of this source and the standards contained in Regulation 6, the Division has determined that this point does meet the definition of a Biomedical Incinerator as covered in Reg. 6, Part B, Section V. This decision is based upon review of the statement of basis associated with the development of the standards in the regulation. As such the pathological incinerator will be required to meet all of the standards and applicable requirements as described for S004. The Construction Permit associated with this point will not be modified because the Operating Permit is expected to be issued soon. The applicable requirements from Regulation 6 will be added to the operating permit under Colorado Regulation 3, Part B, Section III.A.4. (03/21/96). Specific requirements include:

- I) opacity is not to exceed 10%
- ii) particulate emissions are not to exceed 0.03 grains/dry standard cubic foot, including condensibles, corrected to 7% O₂.
- iii) hydrogen chloride (HCL) emissions are not to exceed 50 ppmvd, corrected to 7% O2, over any one-hour period, or a 90% reduction, by weight, on an hourly basis.
- iv) carbon monoxide emissions are not to exceed 100 parts per million, dry volume (ppmvd), corrected to 7% $\rm O_2$.
- v) an interlock mechanism must be in place to prevent charging (loading) the incinerator until the secondary combustion chamber exit temperature is established and holding at 1800°F. During startup the secondary combustion chamber must be pre-heated to at least 1800°F prior to firing the main burner. During shut-down, the secondary combustion temperature must be maintained at 1800°F until the final waste is burned. The secondary chamber shall have a residence time of 2 second.
- vi) continuous temperature monitoring and recording devices must be installed and operated.
- vii) flue gas temperature at the outlet of the final control devise is not to exceed 300°F, unless a demonstration is made that an equivalent collection of condensible heavy metals and toxic organics can be achieved at a higher temperature or through the use of alternate technologies.

viii) radioactive material may not be burned in this incinerator and a Geiger counter must be used to check for radioactive waste (as per Radiation Control Division and Hazardous Materials and Waste Management Division).

As with the biomedical incinerator above, this unit may become subject to either the recently promulgated 40 CFR 60 Subpart Ce or a NSPS targeting pathological incinerators. As stated above, Title V requires that operating permits with more than three (3) years left before expiration be re-opened to include requirements which are newly applicable.

There were no short term limits removed from this point. All short term limits and other standards are specifically required by regulation and as such will remain as per paragraph two (2) of this document.

- **2. Emission Factors -** Permit 93LR1279I does not provide emission limitations on the source with the exception of particulates. Calculation of emissions was not previously required under 93LR1279I and will not be required under Title V.
- **3. Monitoring Plan -** The monitoring plan shall be the same as that for source S004.

This source appears to meet the definition of a medium Hospital/Medical/Infectious Waste Incinerator (HMIWI). As a medium HMIWI this source will need to meet the following limitations:

PollutantEmission LimitParticulate Matter0.03 gr/dscfCarbon Monoxide40 ppmv

Dioxins/Furans 55 gr/billion dry standard cubic feet

Hydrogen Chloride 100 ppmv Sulfur Dioxide 55 ppmv Nitrogen Oxides 250 ppmv

Lead 0.052 gr/thousand dry standard cubic feet Cadmium 0.07 gr/thousand dry standard cubic feet Mercury 0.24 gr/thousand dry standard cubic feet

An initial compliance test for the above pollutants is also required. Facilities must then test for PM, CO, HCL, and opacity on an annual basis. Because of the difficulty in meeting the limitations as well as the overall costs involved, the Division believes many affected facilities will be dismantled or converted to uses not covered by NSPS Ce.

4. Compliance Status - The source certified that they were in compliance with

all applicable requirements. However, since it has been determined that this source is now subject to the stricter standards contained in the Biomedical Incinerator NSPS, the source will need to re-evaluate the compliance of this unit. The stack test required above should ensure that this unit is in compliance with the newly applicable requirements.

IV. Insignificant Activities:

Generally identified insignificant activities include noncommercial (in-house) experimental and analytical laboratory equipment, chemical storage tanks or containers less than 500 gallons, landscaping and site housekeeping devices, chemical storage areas where chemicals where total capacity does not exceed 5000 gallons, storage of butane, propane, or LPG in a vessel with a capacity of less than 60,000 gallons, fuel storage and dispensing equipment where daily fuel throughput is no more than 400 gallons per day. Since this is a large university, the listing of specific equipment is quite extensive. There are 79 natural gas fired boilers, water heaters, or space heaters with less than 10 MMBTU/hr design heat input rate. There are 19 emergency generators under 737 horsepower which operate less than 250 hours per year. An additional generator less than 1840 horsepower operates less than 100 hours per year. Note that while this equipment is APEN exempt and insignificant, emissions were taken into account for PSD purposes. Additionally, 41 above ground storage tanks are below deminimis levels containing propane, diesel fuel, liquid nitrogen, gasoline, waste oil, liquid oxygen, and number 6 fuel oil.

A complete listing of these activities may be found on forms supplementing Form 102B in the source's Title V Operating Permit Application.

V. Alternate Operating Scenarios:

The source has informed the Division that it intends to switch to No. 2 oil in the fall once it has exhausted its current supply of No. 6 oil. The use of No. 2 oil will require that emissions calculations use the following emissions factors:

EPA-454/R-95-012 FIRE Version 5.0 (August 1995)		
	Emission Factors	
	Boilers 1-3	

Pollutant	No. 2 Fuel Oil lbs/1000 gal.
NOx	20.0
SO ₂	143 (S)
VOC	0.34
СО	5.0
PM ₁₀	1
PM	2

(S) is the weight percent of sulfur present in the fuel oil

Compliance with the particulate and sulfur dioxide standards while burning No.2 oil shall be demonstrated using the following equations:

All other conditions and limitations as described in this document and as listed in the Operating Permit shall remain as written once the source switches fuel oils.

VI. Permit Shield

The source did not request the permit shield for specific nonapplicable requirements; however, the Division thought it would be prudent to provide the shield for the following nonapplicable requirements:

A. 40 CFR Part 60 Subpart E, Standards of Performance for Incinerators. The NSPS applies to incinerators with charging rates of more than 45 metric tons/day. Neither incinerator has a charging rate approaching the deminimis level due to an enforceable limitation.

B. 40 CFR Part 60 Subpart Ea, Standards of Performance for Municipal Waste Combustors. The NSPS applies to Municipal Waste Combustors (MWC)with capacities greater than 250 tons/day. Neither incinerator qualifies as a MWC nor

have charging rates approaching the deminimis level due to an enforceable limitation.

VII. Accidental Release Prevention Program 112(r)

A provision under Part 70 of the Clean Air Act (amended) is the Accidental Release provisions of section 112(r). Under this program, EPA established a list of substances which pose the greatest risk of death or serious injury to humans or extreme harm to the environment. Additionally, a list of flammable substances and high explosives were set forth. Each substance was given a threshold or deminimis level by considering their individual toxicity, reactivity, volatility, flammability, explosiveness, and dispersiveness. Facilities using any of these substances in greater-than-threshold quantities are required to prepare and implement a Risk Management/Prevention Plan for those substances.

This source is subject to the provisions of 112(r). A risk management plan is required to be submitted to the appropriate authority and/or a designated central location by June 20, 1999. A certification must also be submitted stating that the source is in compliance with 112(r) and that the risk management plan has been properly submitted.